

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

| | | |
|-----------------------|---|---------------------------------------|
| In re: |) | |
| |) | |
| Molyna Sak |) | Case No. 09-12338-SSM |
| |) | Chapter 7 |
| _____ |) | |
| |) | |
| Vourrit Keosann |) | |
| |) | |
| and |) | |
| |) | |
| Bunnara Chhim Keosann |) | |
| |) | |
| Plaintiffs |) | |
| |) | |
| vs. |) | |
| |) | Adversary Proceeding No. 09-01187-SSM |
| Molyna Sak |) | |
| _____ |) | |
| Defendant |) | |
| _____ |) | |

MOTION TO WITHDRAW

COMES NOW, Robert L. Vaughn, Jr., and the law firm of O'CONNOR & VAUGHN L.L.C., and, due to irreconcilable differences between counsel and the clients, moves this court for leave to withdraw as counsel for the Plaintiffs, Vourrit Keosann and Bunnara Chhim Keosann.

WHEREFORE, Robert L. Vaughn, Jr., and the law firm of O'CONNOR & VAUGHN L.L.C. move this Court that they be granted leave to withdraw as counsel for the Plaintiffs.

Vourrit Keosann and Bunnara Chhim Keosann
Plaintiffs

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O'CONNOR & VAUGHN L.L.C.
11490 Commerce Park Drive, Suite 510
Reston, Virginia 20191
Telephone 703-689-2100
Facsimile No. 703-471-6496

By: /s/ Robert L. Vaughn, Jr.
Robert L. Vaughn, Jr. (VSB #20633)

NOTICE OF MOTION AND HEARING

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief sought in the Motion, or if you want the court to consider your views on the Motion, then within fifteen (15) days from the date of service of this Motion, you must file a written response explaining your position with the Court at the following address: **Clerk of Court, United States Bankruptcy Court, 200 S. Washington Street, Alexandria, Virginia 22314**, and serve a copy on the movant's attorney at the address shown below. Unless a written response is filed and served within this fifteen-day period, the Court may deem opposition waived, treat the Motion as conceded, and issue an Order granting the requested relief.

If you mail your response to the Court for filing, you must mail it early enough so that Court will **receive** it on or before the expiration of the fifteen-day period.

In order to oppose the Motion, you must also attend a preliminary hearing scheduled to be held on **August 18, 2009 at 9:30 a.m.** in the courtroom of The Honorable Stephen S. Mitchell, United States Bankruptcy Court, 200 S. Washington Street, Alexandria, Virginia.

If you or your attorney do not takes these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting relief.

Date: July 18, 2009.

Signature, name, address and telephone
number of person giving notice:

/s/ Robert L. Vaughn, Jr.
Robert L. Vaughn, Jr., VSB 20633
11490 Commerce Park Drive, Suite 510
Reston, Virginia 20191
(703) 689-2100
***Counsel for Vourrit Keosann and
Bunnara Keosann***

Certificate of Service

I hereby certify that on July 18, 2009, I mailed a true copy of this Motion for Relief from Stay/Discharge Injunction and Notice of Motion and Hearing to each party required to receive notice under Local Bankruptcy Rule 4001(a)-1(E)(1) as follows:

Molyna Sak
201 Greenhow Court SE
Leesburg, VA 20175

Donald F. King, Trustee
9302 Lee Highway, Suite 1100
Fairfax, Virginia 22031

Nora Raum
2007 North 15th Street Suite 201
Arlington, VA 22201
Counsel to Debtor.

/s/ Robert L. Vaughn, Jr.
Robert L. Vaughn, Jr.